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**BY ECF**

The Honorable LaShann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Sun Soo (Steve) Chon*, 22-CR-259 (LDH)

Dear Judge DeArcy Hall:

I am counsel to defendant Steve Chon and write to request that Mr. Chon's sentencing, which is currently scheduled for June 8, 2023, be continued to a date sometime during the week of October 16, 2023. The primary reason for this request is to afford sufficient time for the defense to prepare for the sentencing hearing. Specifically, the need to obtain official Korean to English translations for many letters of support being written by Mr. Chon's family, friends, and community members, as well as the need for sufficient time to analyze the Sentencing Commission's recent preliminary Guidelines amendments. A secondary reason for this request is that the current June 8 date conflicts with the 2023 NYU Tax Controversy Forum, of which co-counsel Bryan C. Skarlatos is a chairperson, and which undersigned counsel is scheduled to attend.

This is Mr. Chon's first request for an adjournment of the sentencing hearing. I have conferred with counsel for the United States and confirmed that the government has no objection to this application. I have also conferred with the Court's courtroom deputy, who has advised me that the Court has availability for this sentencing proceeding during the week of October 16, 2023. Both parties are available on any date that week. Should this request be granted, Mr. Chon further requests that the deadline for the submission of his sentencing memorandum be extended to September 15, 2023, and that the government be permitted to file a supplemental memorandum to address any objections to the Presentence Investigation Report by August 15, 2023.

I thank the Court for considering this request.

Respectfully submitted,

/s/Brian P. Ketcham  
Brian P. Ketcham

Cc: DOJ Trial Attorneys Jorge Almonte and Ann M. Cherry (by ECF)